

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE**

UNITED STATES OF AMERICA

v.

KILMAR ARMANDO ABREGO GARCIA,

*Defendant.*

No. 3:25-cr-115

Judge Waverly D. Crenshaw, Jr.

**MOTION TO EXCUSE ATTORNEY APPEARANCE**

David Patton, counsel to Defendant Kilmar Armando Abrego Garcia, respectfully requests that this Court excuse him from appearing at the evidentiary hearing on the government's motion for revocation of Judge Holmes's release order, which is currently set for Wednesday, July 16, 2025, at 1:00 p.m. ECF 56. As cause, undersigned counsel submits that beginning on Monday, July 14, 2025, he is representing a defendant in a federal criminal jury trial in *United States v. Storm*, Case No. 23-cr-430, before Judge Katherine Polk Failla in the Southern District of New York. Undersigned counsel's co-counsel, Sean Hecker, Jenna Dabbs, and Rascoe Dean, will be present at the hearing to represent Mr. Abrego. Undersigned counsel therefore respectfully requests that this Court excuse his appearance at the evidentiary hearing on the government's motion for revocation of Judge Holmes's release order.

Dated: July 11, 2025  
New York, New York

Respectfully submitted,

/s/ David Patton

Sean Hecker\*

Jenna M. Dabbs\*

David Patton\*

HECKER FINK LLP  
350 Fifth Avenue, 63rd Floor  
New York, NY 10118  
Telephone: (212) 763-0883  
Fax: (212) 564-0883  
shecker@heckerfink.com  
jdabbs@heckerfink.com  
dpatton@heckerfink.com

\* admitted *pro hac vice*

Rascoe Dean (No. 034209)  
SHERRARD ROE VOIGT & HARBISON PLLC  
1600 West End Avenue, Suite 1750  
Nashville, Tennessee 37203  
Telephone: (615) 742-4200  
Fax: (615) 742-4539  
rdean@srvhlaw.com

*Counsel for Defendant Kilmar Armando  
Abrego Garcia*

**CERTIFICATE OF SERVICE**

I hereby certify that on July 11, 2025, I electronically filed the foregoing document with the clerk of the court by using the CM/ECF system, which will send a notice of Electronic Filing to the following: Acting United States Attorney, Robert E. McGuire, 719 Church Street, Suite 3300, Nashville, Tennessee 37203.

/s/ David Patton